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11 OCMBC, INC. dba
12 LOANSTREAM MORTGAGE

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA – SOUTHERN DIVISION

12 KIMBERLY HUDSON-BRYANT,
13 individually and on behalf of all others
14 similarly situated,

14 Plaintiffs,

15 v.

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17 OCMBC, INC. dba LOANSTREAM,
18 PREMIER FINANCIAL MARKETING
19 LLC D/B/A RESMO LENDING, AND
20 SEAN ROBERTS

20 Defendants.

Case No. 8:24-cv-00067-FWS-JDE

**DECLARATION OF THOMAS F.
LANDERS IN SUPPORT OF JOINT
MOTION AND STIPULATION TO
CONTINUE CASE DEADLINES**

Judge: Hon. Fred W. Slaughter

Magistrate: Hon. John D. Early

Action Filed: January 11, 2024

Trial Date: TBD

1 I, Thomas F. Landers, declare:

2 1. I am an attorney at law licensed to practice before all federal and state
3 courts in the State of California and am a partner with Solomon Ward Seidenwurm &
4 Smith, LLP (“SWSS”), counsel for Defendant OCMBC, INC. dba LOANSTREAM
5 MORTGAGE (“Defendant”) in this action. I have personal knowledge of the facts set
6 forth in this declaration and I submit this declaration in support of the Parties’ Joint
7 Motion and Stipulation to Continue Case Deadlines (“Stipulation”).

8 2. Plaintiff filed a class action complaint on or about January 1, 2024.

9 3. After conducting certain discovery, on September 10, 2024, Plaintiff
10 filed a first amended complaint (“FAC”) and named two additional defendants. (ECF
11 No. 37).

12 4. Shortly thereafter, the Parties requested an extension of all case deadlines
13 to properly investigate and address the new allegations in the FAC and to allow the
14 new parties to participate in the case. (ECF No. 40).

15 5. On October 24, 2024, the Court issued a revised scheduling order that
16 imposed the deadlines currently at issue in this Stipulation (“Scheduling Order”).
17 (ECF No. 48). This is the first time the Parties have requested a modification of this
18 Scheduling Order.

19 6. The Parties have actively engaged in substantial written and oral
20 discovery since the issuance of the Scheduling Order, but those efforts are not yet
21 complete. A key witness, who is both a percipient and 30(b)(6) witness for
22 LoanStream was recently involved in a traffic incident that resulted in the witness
23 being unavailable to testify in this case until at least late May or early June 2025. This
24 witness’s testimony is important to both the Plaintiff’s and Defendants’ cases, and
25 may result in additional needed discovery.

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7. For the reasons set forth herein, and to conserve time and judicial resources, the Parties believe that a 60-day extension of all deadlines will allow the Parties to properly complete discovery and prepare for trial.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on April 25, 2025, at San Diego, California.

/s/ Thomas F. Landers

Thomas F. Landers, Esq.